



**PUGET
SOUND
ENERGY**

Puget Sound Energy
Telecommunications Services, IT
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Puget Sound Energy would like to submit a comment to the request for comments that the FCC issued in docket number RM-10687.

Puget Sound Energy (PSE) is an electric and natural gas utility serving nearly 1.3 million customers in western and central Washington State. To safely serve our customers, PSE maintains numerous Critical Infrastructure radio systems. Primarily comprised of a 900 MHz multi-site centralized trunking radio and an extensive simplex, voted VHF systems. The VHF system operates in the former power band and has always been coordinated by UTC. The 900 MHz system is in the I/LT band coordinated by ITA.

In the early 1990s, the predecessor of PSE licensed a number of 900 MHz frequencies for the operation of a trunked radio system. The system was built and is operating. In 2001, due to an administrative oversight, one of our 900 MHz licenses lapsed. When we went to re-license the frequencies which we were actively using, we were unable to coordinate due to a license that was previous coordinated by ITA, and granted on frequency within 17 km of one of our sites. This previous coordination and licensing was done at approximately the same time that our license was coordinated and licensed.

Not only were the ITA-coordinated frequencies short spaced, they were coordinated and licensed without mobile frequencies—errors like these should not happen. Even though the other entity has never operated on the frequency and was technically in violation—which requires cancellation of the license (not operational for one year)—and even though the FCC was notified over a year ago, nothing has been resolved that would undo the problem that was allowed to happen, or was caused, by ITA.

Puget Sound Energy realizes that ITA is the coordinator for the I/B pool where we operate the 900 MHz system. We also realize that procedures that allowed errors to happen some years ago may have been corrected. However, UTC has always been very cognizant of the critical infrastructure use of the power pool frequencies. UTC is an industry organization that does not rely on licensing revenue for its existence, but relies on serving its members with variety of services.

Under current FCC Rules, UTC can offer only limited protection to critical infrastructure systems on the former power pool frequencies. In accordance with the Rules, it can deny an application for these frequencies only upon a showing that the proposed system would have a demonstrable, material, adverse effect on safety, with a written supporting statement explaining the technical basis for the denial. (47 C.F.R. § 90.175(b)(2))

It is vitally important that UTC retain this limited ability to protect mission-critical communications systems from congestion and harmful interference to the extent possible under the Commission's Rules. UTC's membership of electrical, gas and water utilities has an overriding similarity: they are critical infrastructure systems that have extensive telecommunications requirements. Traditionally the most critical component in a critical infrastructure entity's telecommunications arsenal has been its wireless network.

UTC's excellent work on behalf of its members is possible because of its understanding of, and concentration on, the day-to-day operations of its members, their current problems and future needs. ITA cannot claim that it 'represents' critical infrastructure in this manner.

Thus, Puget Sound Energy's Telecommunications Services department urges the Commission to deny ITA's petition to coordinate former Power, Railroad and Auto Emergency channels below 512 MHz.

Submitted by:

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